UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 2 0 2012

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL 7009 1680 0000 7669 1802
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Woodrow B. Jameson
Fluor-B&W Portsmouth, LLC
Post Office Box 548
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Jameson:

On May 14 and 15, 2012, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the U.S. DOE Portsmouth Gaseous Diffusion Plant (U.S. DOE-Portsmouth) installation located at 3930 US Route 23 South, Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based upon information provided by U.S. Department of Energy (DOE), Fluor-B&W Portsmouth, LLC (FBP), and Wastren-EnergX Mission Support, LLC (WEMS) personnel, review of records, and physical observations by the inspectors, EPA has determined that DOE and FBP violated certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that DOE and FBP were not in compliance with the following requirement:

- A small quantity handler of universal waste must manage lamps in a way that

prevents releases of any universal waste or component of a universal waste to the environment. Specifically, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)]. In addition, each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or Used Lamp(s)." See, OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

During the inspection of Building X-700 at column C-8, the inspectors observed several open and unlabeled containers of used fluorescent lamps. DOE - Portsmouth was in violation of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)] and OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)]. On May 15, 2012, Ms. Rosemary Richmond provided the inspectors with photographs of the closed and labeled used fluorescent lamps containers in Building X-700 which were located at column C-8. Based on this information, DOE and FBP have resolved the violations of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)] and OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

In addition, during the records review portion of the inspection the inspectors identified seven hazardous waste manifests from 8/22/2011 through 9/21/2011, that were not signed by the transporter Norfolk Southern Railroad (VAD000650309). FBP personnel provided the inspectors with a copy of an April 10, 2012, letter from DOE to Ohio EPA regarding the manifests not signed by the initial transporter. The letter also stated that FBP was working with the Norfolk Southern Railroad Company to obtain authorization for FBP waste shippers to sign the hazardous waste manifests, "on behalf of Norfolk Southern Railroad Company." We understand that on May 24, 2012, Norfolk Southern Corporation sent a letter to FBP authorizing FBP to sign hazardous waste manifests on behalf of Norfolk Southern Railway Company in the section designated as Transporter.

This letter is to inform you that EPA has reviewed the referenced information, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Ohio EPA will continue to evaluate DOE and FBP in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Melody Stewart, OEPA – Southeast District Office
(melody.stewart@epa.state.oh.us)

bcc: Tim Thurlow, C-14J

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**U.S. DOE PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator and Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	May 14 and 15, 2012
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: Walt F _____ 6/11/2012
Walt Francis — **Date**
Environmental Scientist

ACCEPTED BY: _____ 6-12-12
Paul Little, Chief — **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Fluor-B&W Portsmouth, LLC (FBP), Wastren-EnergX Mission Support, LLC (WEMS) and Restoration Services (RSI)-
Kristi Wiehle, U.S. DOE
Amy Lawson, U.S. DOE
Rosemary Richmond, FBP
Chris Guilliams, FBP
Robert Lyon, FBP
Jim Thomson, FBP
Bridget Eslinger, FBP
Robert Anderson, WEMS
Greg Miller, RSI
Jeremy Davis, RSI

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as the permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and were leased by USEC. As of March 2012, U.S. DOE and FBP activities include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700);

maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and FBP from the environmental restoration is also stored in these facilities. U.S. DOE also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and are generated by U.S. DOE and FBP are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/FBP generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah, Perma-Fix, Gainesville, Florida, and Diversified Scientific Services, Inc. (DSSI), Kingston, Tennessee. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. Babcock & Wilcox Conversion Services is working on a project to recover material from depleted uranium hexafluoride cylinders.

On March 25, 2011 Ohio EPA renewed the RCRA Permit for the Portsmouth facility. The renewed RCRA Permit includes six container storage areas in Building X-326. The renewed RCRA Permit states in Section B.36(m) that U.S. DOE/FBP may store restricted waste beyond one year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal [OAC Rule 3745-270-50].

Opening Conference

On May 14, 2012 Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 7:40 a.m. and informed the U.S. DOE and FBP representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and Ohio EPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief

update of the facility since the last inspection, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, and universal waste accumulation areas. Ms. Kristi Wiehle allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-326. Mr. Guilliams introduced Ms. Vickie Glenn to the inspectors. Ms. Glenn showed the inspectors the "L Cage" permitted storage areas. Inspector Francis observed a container labeled "Waste Oil" (RFD # 10-003070) with a 1/1/1988 accumulation date. The walk-through continued to a hazardous waste less than 90 day area at column B82. The walk-through continued to the RCRA Permitted Area #1. Inspector Francis observed a tote labeled "X-700 Tank #1 Closure, F001, 12/28/2009". The walk-through continued to Areas #6 and then to Area #3. In Area #6, Inspector Francis observed five 55-gallon containers labeled "Non-Regulated Waste, Alumina Air Control Top Purge, RFD numbers 08-0022359, 08-002357, 08-002360, 08-0022356, and 08-002358. In Area #3, Inspector Francis observed a container labeled "X-700 Tank #2 Solution, D002/D006/D007/D009/D018/F001, 2/18/2010, RFD # 63819." The walk-through continued to Area #5. Inspector Francis observed a container labeled "Bulbs D009." The walk-through continued to Area #2. Inspector Francis observed a container labeled "DOE PCB Oil, 6/17/2009, Drum ID 09-002529" in Section 2, Row 3. The walk-through continued to Area #4. Inspector Francis observed a container labeled "D008/PCBs, WC # 11-001394", and several 5-gallon containers of hazardous waste. The inspection continued to a hazardous waste less than 90 day area at column C-48. Inspector Francis observed a container of acetone and water. The walk-through continued to a universal waste accumulation area. Inspector Francis observed a 1 gallon container utilized for used bulbs from the control room. The inspection continued to a polybottle accumulation area at column G-25. Inspector Francis noted that one of the polybottles was labeled "Seal Exhaust Oil, #581502". Mr. Guilliams told the inspectors that the oil would be shipped out as radioactive waste. The inspection continued to the Control Room (ACR). Ms. Glenn showed the inspectors observed a blue Universal Waste accumulation container in the Control Room at column L-62.

The inspection continued to Building X-330. Ms. Glenn showed the inspectors a hazardous waste less than 90 day accumulation area. The inspectors observed several pallets of used lead acid batteries. The walk-through continued to the Electrical Maintenance Ship at Column G-43. Mr. Guilliams pointed out a SAA container utilized for accumulating broken fluorescent lamps, and an area where used fluorescent lamps are accumulated from all three process building at column W35. Mr. Guilliams told the inspectors that USA lamps, Cincinnati, Ohio picks up the used lamps from Building XT-847. The inspection continued to a room where Mr. Guilliams showed the inspectors a 5-gallon container SAA container of gasket cleaning hazardous waste. The walk-through continued to a used oil accumulation area and used lead acid battery accumlation area. The walk-through continued to Building X-530. Inspector Francis observed a 55-gallon container of used oil and several used oil pails which were labeled "Used Oil'. The walk-through continued to Building X-345. Mr. Guilliams introduced Mr. Matt Kildow, Small Cylinder

Operations Manager. Mr. Kildow showed the inspectors two 55-gallon containers of hazardous waste in a less than 90 day accumulation area. Inspector Francis observed that the containers were labeled "Scrap Metal and Track Blast Material, D005/D007/D008/D009, 4/19/12, Building X-326, RFD # 12-000996." Mr. Kildow also showed the inspectors two polybottles containing used oil. The walk-through continued to Building X-344A. Mr. Guilliams showed the inspectors an area where universal waste bulbs are accumulated. Inspector Francis observed a container of mercury vapor bulbs dated "4/3/12", a container of used incandescent bulbs dated "4/23/12", and two containers of four foot used fluorescent lamps dated "2/1/12." The inspection continued to Building X-342. Mr. Guilliams showed the inspectors a SAA container labeled "HF and F2 Sensors". The inspection continued to Building X-700. Mr. Guilliams introduced Mr. Marvin Ross. Mr. Ross showed the inspectors a tanker truck which accumulates hazardous waste for less than 90 days which is taken to Building X-627. Inspector Francis observed that the tanker truck had a "5/14/12" accumulation date. The inspection continued to a less than 90 day accumulation area in Building X-700. Inspector Francis observed one 55-gallon container dated "5/4/12", five 5-gallon containers labeled "Lab Decon", "Lead", "Broken Bulbs", two containers of "Lab Organic Waste", and "Lead Compounds". The inspection continued to a universal waste accumulation area in Building X-700. The inspectors observed four 4-foot containers of used fluorescent lamps dated "4/3/12, 4/8/12, 2/9/12, 3/25/12." The walk-through continued to another less than 90 day area in Building X-700. Mr. Marvin Ross showed the inspectors six 85-gallon overpack drums. Inspector Francis observed that the containers were labeled "Heavy Metal Sludge" with accumulation dates of "3/15/12", "5/2/12", "3/28/12", "4/10/12", "3/28/12", "4/24/12." The walk-through continued to an area of Building X-700 utilized by WEMS. Mr. Robert Anderson showed the inspectors the Paint Shop. Inspector Francis observed one 30-gallon SAA container labeled "Waste Paint, F005", and a 10-gallon SAA container labeled "Aerosol Cans", four containers of used oil, and one 30-gallon container of used antifreeze. The walk-through continued in Building X-700 to another universal waste accumulation area. The inspectors observed several open cardboard boxes of used and unused fluorescent lamps. The cardboard boxes were dated "8/4/11" and 7/14/11." The inspection continued to another area where nickel-cadmium batteries were accumulated. Inspector Francis observed that the container was labeled "Ni-Cd batteries with a "7/2/11" accumulation date. The walk-through continued to a 5-gallon SAA container in the WEMS area in Building X-700. Mr. Anderson showed the inspectors a 5-gallon container of waste paint. The walk-through continued to Building X-720. In Building X-720, Mr. Guilliams introduced Ms. Beverly Kelley to the inspectors. Ms. Kelley showed the inspectors a universal waste accumulation area, SAA accumulation container, and a less than 90 day accumulation area, at column H-10. The inspectors observed a container of incandescent bulbs dated "5/10/12", a container of used compact fluorescent bulbs dated "6/6/11", and two 30-gallon containers of used aerosol cans dated "3/12/12" and 4/16/12", and a 55-gallon SAA container. The inspection continued in Building X-720 to column L-15. At column L-15, the inspectors observed two 5-gallon SAA accumulation containers labeled "Waste Oil and Solvent from Switchyard", and "Rags and Gloves", and a container labeled "Ni-Cd Bateries Universal Waste." The walk-through continued to the Cleaning Room in Building X-720. The inspectors observed two SAA polybottles in this area and two 55-gallon containers labeled "CRT – Cathode Ray Tubes, RFD #66584/WLT 11-001419 and RFD# 66585/12-

001420." The inspection continued to the Seal Shop. The inspectors observed another SAA container. The inspection continued to another universal waste accumulation area. Inspector Francis noted that the four foot and eight foot used fluorescent lamp boxes were dated "2/21/12". The walk-through continued to the Paint Shop in Building X-720. Inspector Francis noted that the less than 90 day container was labeled with a "5/2/12" accumulation date. The inspection continued to Building X-720C. Ms. Kelley showed the inspectors two 5-gallon containers of waste oil base paint and waste paint thinner with "5/9/12" accumulation dates. The walk-through continued to Building X-750. Ms. Kelley showed the inspectors a parts cleaner, a 5-gallon container of used aerosol cans, a used oil container, and a 55-gallon less than 90 day container that was labeled "Gas and Diesel Fuel". Ms. Kelley told the inspectors that the parts washer utilized a solvent called "Buckeye Shopmaster." Inspector Francis asked Ms. Kelley how the used parts washer solvent was handled. Ms. Kelley told the inspectors that any used parts washer solvent is added to the "Gas and Diesel Fuel" waste container. The inspection continued to Building X-104. At Building X-104, Ms. Kelley showed the inspectors a 55-gallon SAA container utilized for waste rags and patches from weapon firing in the garage. The walk-through continued to room 145 in Building X-104. Ms. Kelley showed the inspectors a SAA container of weapon cleaning solution and lead. The inspection continued to Building X-720 at column 7. Mr. Guilliams showed the inspectors two metal boxes of excavated soil that were labeled "F001, 5/14/12", and a universal waste accumulation area. Inspector Francis observed two cardboard boxes of used fluorescent lamps with "5/4/12 and 5/9/12" accumulation dates. The walk-through continued to Building X-300. In Building X-300, Ms. Kelley showed the inspectors a universal waste accumulation container with a "2/10/12" accumulation date. The inspection continued to Building X-710. At Building X-710, Mr.Guilliams introduced Mr. Brian Pyles. Mr. Pyles showed the inspectors a less than 90 day hazardous waste accumulation area in Room 144. Inspector Francis observed a container with nitric acid and water with a "3/20/12" accumulation date, and another container labeled "Acids" with a "3/21/12" accumulation date. The walk-through continued in Building X-710 to Room 103. Mr. Pyles showed the inspectors another less than 90 day hazardous waste accumulation area and a universal waste accumulation area. Inspector Francis observed a 5-gallon container of "Waste Heptane" with a "5/7/12" accumulation date and a 5-gallon container of "Waste Acetone/Heptane" with a "4/18/12" accumulation date, and several cardboard boxes of 4 foot used fluorescent lamps with a "4/10/12" accumulation date. The walk-through continued to Room 113 where the inspectors observed a 30-gallon SAA container of used aerosol cans. The walk-through continued to rooms 142, 154, and 157 where the inspectors observed SAA containers. The walk-through continued to room 285 where the inspectors observed four 5-gallon and one 30-gallon SAA containers. The walk-through continued to room 266 where the inspectors observed another 5-gallon SAA container of "planchettes." The walk-through continued to rooms 245, 213, 262, 254, 263, 213, 212, 224, 223, 203, and 216 where the inspectors observed various SAA containers. The walk-through continued to Building X-100. Mr. Brian Pyles showed the inspectors a universal waste accumulation area on the Loading Dock Area inside a cage. Inspector Francis observed ten cardboard boxes of 4-foot used fluorescent lamps with accumulation dates of "1/23/12" and "4/26/12". The walk-through continued to Building XT-847. The inspectors met Ms. Barbara Holcum, Ms. Elizabeth Lamerson, and Ms. Mabel Tanner. Ms. Tanner showed the inspectors an

empty hazardous waste less than 90 day accumulation area at column L-2. The walk-through continued to another hazardous waste less than 90 day accumulation area at column N-2, and then to a universal waste accumulation area, and then to a used oil accumulation area at column N3. The walk-through continued to another universal waste accumulation area at column D-17. Inspector Francis observed containers of four-foot universal waste used lamps with "9/17/11, 3/1/12, ad 8/30/11" accumulation dates, and a 5-gallon container which was labeled "Airbag, RFD #C4096/#64096". The walk-through continued to a 55-gallon SAA container of "Broken Fluorescent Lamps". Inspector Francis asked Ms.Tanner what off-site facility accepts the used fluorescent lamps. Ms. Tanner told the inspectors that used lamps are picked up by USA Lamp, Cincinnati, Ohio. The walk-through continued to a hazardous waste less than 90 day accumulation area at column C-2. The inspectors observed a 55-gallon container labeled "Used Gas and Diesel, D001/D018, 4/18/12". The walk-through continued to another universal waste accumulation area at column N18. The inspectors observed 4-foot and eight-foot used fluorescent lamps in cardboard boxes with "12/1/11 and 2/29/12" accumulation dates. The walk-through continued to Building X-7721. The inspectors observed several boxes of four-foot and eight foot universal waste used lamps at column F-3 which were labeled and dated "2/6/12, and 1/31/12", and additional universal waste lamps at column F-8, and a 55-galon SAA of Buckeye Shopmaster parts cleaner. The walk-through continued to Building X-627. At Building X-627 Mr. Greg Thompson showed the inspectors a 55-gallon SAA container of "Bag Filters, F001." The inspection continued to Building X-623 Groundwater Treatment. Mr. Thompsen showed the inspectors a 55-gallon SAA container of plastic and PPE with an F002 hazardous waste code.

On Tuesday May 15th at approximately 7:30 a.m. the inspectors continued the inspection at Building X-622. At Building X-622, Mr. Greg Thompson showed the inspectors a 55-gallon SAA container of F001 waste. The walk-through continued to Building X-624. At Building X-624, Mr. Thompson showed the inspectors a 55-gallon SAA container labeled "Bag Filters, PPE, and Plastic, F001". The walk-through continued to Building X-230J-1. The inspectors observed two 55-gallon containers labeled "Sediment Debris, F001, 4/11/12." Mr. Guilliams explained that a pipe had been cleaned out at NPDES Outfall #001. The walk-through continued to Building X-752. At Building X-752, Mr. Mitch Newman showed the inspectors a universal waste battery accumulation area in Bay R, and a 55-gallon SAA container of used aerosl cans in Bay Q. The walk-through continued to Warehouse #9. Mr. Guilliams introduced Mr. Bill Armstrong and Mr. Michael Binkley. Inspector Francis observed four 55-gallon containers labeled "Electrical Recyclables", a container of universal waste batteries dated "5/14/12,", a 55-gallon SAA container labeled "Broken Fluorescent Tubes," and a 55-gallon container labeled "Mop Oil" dated 8/19/92. The walk-through continued to the Building X-747H Shipping Pad. Mr. Newman showed the inspectors a hazardous waste less than 90 day accumulation area that contained a 5-gallon container labeled "R-11" with a 3/1/2012 accumulation date and two 55-gallon containers labeled "Oil, D008, 3/1/2012, RFD # 12-001174." The walk-through continued to Building X-705. Mr. Marvin Ross met the inspectors at Building X-705. The inspection group received instructions on entering Building X-705, including donning one pair of cloth coveralls, one pair of yellow plastic coveralls, one pair of plastic booties, one pair of rubber boots, and two pairs of latex gloves. The inspection team entered Building X-705. Mr. Ross showed the

inspectors a hazardous waste less than 90 day accumulation area, a SAA container for aerosol cans, a SAA container at the micro sludge area, and a SAA container for the heavy metal sludge, and a less than 90 day area in the High Bay area.

The inspectors then returned to Building X-100 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, less than 90-day hazardous waste accumulation area closure final inspection and close-out letters, and weekly inspection logs. The inspectors reviewed off-site hazardous waste manifests. Specifically, the inspectors reviewed several out-bound hazardous waste manifests dated 8/22/11, 9/21/11, 7/19/11, 9/14/11, 8/30/11, 9/8/11, and 8/23/11 for rail shipments of F001 hazardous waste to Energy Solutions, Clive, Utah (UTD982598898). The inspectors observed that the transporter was Norfolk Southern Railroad (NSR) (VAD000650309). However, NSR had not signed the manifests. Universal Waste was being shipped to USA Lamp and Ballast Recycling, Cincinnati, Ohio, and the date of the last off-site shipment was 4/12/2012. Used oil was picked up by Glockner Oil, Piketon, Ohio. The inspectors reviewed a Contingency Plan that was last updated in October 2011.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and FBP would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis discussed the NSR unsigned manifests. Ms. Richmond provided the inspectors with an April 10, 2012 letter to Ohio EPA regarding the rail shipment manifests not being signed by the transporter. In addition, Inspector Francis discussed the open and unlabeled universal waste used fluorescent lamps boxes in Building X-700 at column C8.

Attachments
Inspection Checklists.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: U.S. DOE - Portsmouth Gaseous Diffusion EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio
(If different from above)

Telephone: Rosemary Richmond 740-897-2967 Fax #: _____

Owner/ Operator: Federal Government
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 5/14 and 15, 2012 Time(s): 7:45 am

Inspection Announced? _____ Yes X NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Kristi Wiehle	U.S. DOE	740-897-5020
	Rosemary Richmond	FBP	740-897-2967
	Chris Guilliams	FBP	740-897-3863

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	X Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
X Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	X Used Oil
	X Universal Waste
	_____ Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

NOTE TO THE INSPECTOR

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
April 2012

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Portsmouth Gaseous Diffusion Plant
04-66-0680

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Fluor–B&W Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7890008983
Facility Phone: 740-897-5010

County: Pike

Time: 7:45 am

Inspection Date: 5/14/2012 and 5/15/2012

Advance notice of inspection given? ___(Yes) __X__(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	Kristi Wiehle	U.S. DOE	740-897-5020
	Rosemary Richmond	Fluor-B&W Portsmouth, LLC	740-897-2967

Is facility operating as a generator? Yes __X__ No _____

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued:	March 25, 2011
Permit Effective Date:	March 25, 2011
Permit Expiration Date:	March 25, 2021

STORAGE		**TREATMENT**		**DISPOSAL**	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. In 1993, DOE began leasing the uranium enrichment production and operations facilities at PORTS to the United States Enrichment Corporation (USEC). Uranium was enriched at the site by USEC until May 2001, at which time the production facilities were placed into a cold standby mode. During cold standby, the process buildings were maintained with a restart capability. DOE terminated the cold standby program in September 2005 and replaced it with a cold shutdown program, which no longer maintains the gaseous diffusion restart capability. The PORTS site is owned by DOE and the uranium enrichment facilities are in the process of being transitioned back to DOE from USEC. Ongoing activities at the facility include decontamination and decommissioning of facility buildings, ongoing site environmental restoration, and maintenance of the permitted hazardous waste storage area.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE has in the past sent some waste off-site (to USDOE Oakridge) for treatment (incineration) prior to final disposal. Treatment residuals had been returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004, June 23, 2005, February 22, 2008 and March 28, 2011. The latest amendment added Fluor-B&W Portsmouth, LLC and Babcock & Wilcox Conversion Services, LLC to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 25, 2011.

On April 13, 2010, DOE signed the Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action (DFF&O). The DFF&O outline the process for decontamination and decommissioning of the facility buildings.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: — Yes___No_X_N/A ___RMK#___

   a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? — Yes___No___ N/A _X_RMK#___

   b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] — Yes___No___ N/A_X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the permittee submitted the annual permit fee, payable to Treasurer, State of Ohio, to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26] — Yes_X_No___ N/A ___RMK#___

3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1.(b) and A.5] — Yes___No_X_N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] — Yes___No_X_N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: — Yes___No_X_N/A ___RMK#___

Training —
— Fix corrosion on spill pallets.

a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A X RMK#__

ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility, including a description of:

A. Name, address and telephone number of the owner or operator? — Yes__No__ N/A __ RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A __ RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A __ RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A __ RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A __ RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A __ RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A X RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A __ RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A __ RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?

Yes___No___ N/A X RMK#___

Note: *The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]

Yes___No___ N/A X RMK#___

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5?

Yes X No___ N/A ___RMK#___

Reporting

a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]

Yes___No___ N/A ___RMK#___

b. Do the reports provided contain the information set forth in Condition A.20?

Yes___No___ N/A ___RMK#___

9. Has the permittee planned any physical alterations or additions to the permitted facility?

Yes___No___ N/A ___RMK#___

a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]

Yes___No___ N/A ___RMK#___

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] yes permit mod, control plan — Yes Y No___ N/A ___ RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes___ No Y N/A ___ RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes___ No___ N/A ___ RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes___ No___ N/A ___ RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19.] — Yes___ No___ N/A Y RMK#___

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] — Yes___ No___ N/A Y RMK#___

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] — Yes___ No___ N/A Y RMK#___

6. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the HWFB? If so, — Yes___ No___ N/A Y RMK#___

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] Yes___No___ N/A _X_RMK#__

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes_X_No___ N/A ___RMK#___

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes_X_No___ N/A ___RMK#___

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:

   a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? — Yes Y No___ N/A ___RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes Y No___ N/A ___RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes Y No___ N/A ___RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes Y No___ N/A ___RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes___ No Y N/A ___RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

a. A description and the quantity of each hazardous waste received? Yes X No___ N/A ___RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

ANNUAL REPORT REQUIREMENT

6. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.12.(b) of the permit, do the permittee's records of monitoring information specify the:

   a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 Method or an equivalent method specified in the approved waste analysis plan? [Condition A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes X No___ N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes X No___ N/A ___RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] Yes__No X N/A ___RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] Yes X No__ N/A ___RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? Yes__No__ N/A X RMK#__

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] Yes__No__ N/A X RMK#__

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] Yes__No__ N/A X RMK#__

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] Yes X No__ N/A ___RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] Yes X No__ N/A ___RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] Yes X No__ N/A ___RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? Yes X No__ N/A ___RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? Yes✓ No___ N/A ___RMK#___

7. If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit? on-site QA-QC Yes✓ No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes X No___ N/A ___RMK#___

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes X No___ N/A ___RMK#___

3. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15? Yes X No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes X No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes X No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes X No___ N/A ___RMK#___

4. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5.] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes X No___ N/A ___RMK#___

6. In accordance with OAC rule 3745-54-15(D) and Condition B.5. of the permit, do inspection records contain the following information:

   a. Date and time of inspection? Yes X No___ N/A ___RMK#___

b. Signature of inspector? Yes Y No___ N/A ___RMK#___

c. Notation of observations made? Yes Y No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes Y No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes Y No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes Y No___ N/A ___RMK#___

   c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes Y No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading ADanger-Unauthorized Personnel Keep Out@ posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes Y No___ N/A ___RMK#___

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface waters? [Condition B.1.] Yes Y No___ N/A ___RMK#___

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X No___ N/A ___RMK#___

   b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X No__ N/A ___RMK#__

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6.] — Yes X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X No___ N/A ___RMK#___

3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? — Yes X No__ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? — Yes X No__ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? — Yes X No__ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? — Yes X No__ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? — Yes X No__ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and — Yes X No__ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? — Yes X No__ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] — Yes X No__ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so, — Yes X No__ N/A ___RMK#___

   a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)] — Yes__No__ N/A X RMK#___

4. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.] — Yes X No__ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes X No__ N/A ___RMK#___

6. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes X No__ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] DAWN MITCHELL. — Yes X No__ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes X No__ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes X No__ N/A ___RMK#___

   a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.] — Yes___No X N/A ___RMK#__

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes___No___ N/A X RMK#__

   c. Within 15 days of the incident did the permittee submit, to the director, a written report of the incident? If so, — Yes___No___ N/A X RMK#__

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes___No___ N/A X RMK#__

   d. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.23.] — Yes___No___ N/A X RMK#__

REMARKS

CLOSURE PLAN/AMENDMENT – post of Part

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, — Yes X No___ N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes X No___ N/A ___RMK#___

NOTE: *Also see RECORDKEEPING REQUIREMENTS (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___No___ N/A X RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___No___ N/A X RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31.] — Yes___No___ N/A X RMK#___

   d. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32.] — Yes___No___ N/A X RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes___No___ N/A X RMK#___

   f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33.] — Yes___No___ N/A X RMK#___

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

6. Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)] Yes X No___ N/A ___RMK#___

7. Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)] Yes X No___ N/A ___RMK#___

8. As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)] Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for < 90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with < 90-day accumulation of wastes.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] — Yes X No___ N/A ___RMK#___

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326? [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] — Yes X No___ N/A ___RMK#___

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] — Yes X No___ N/A ___RMK#___

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] — Yes X No__ N/A ___RMK#___

   a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] — Yes__No_ N/A X RMK#___

9. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4.] — Yes X No__ N/A ___RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] — Yes X No__ N/A ___RMK#___

11. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5.(b)] — Yes X No__ N/A ___RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] — Yes X No__ N/A ___RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] — Yes X No__ N/A ___RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] — Yes X No__ N/A ___RMK#___

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No___ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] — Yes X No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] — Yes X No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] — Yes X No___ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? — Yes X No___ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? — Yes X No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? — Yes X No___ N/A __RMK#__

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, — Yes___ No X N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] — Yes___ No___ N/A X RMK#__

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] — Yes___ No___ N/A X RMK#__

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]

Yes X No__ N/A ___RMK#__

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]

Yes__No__ N/A X RMK#__

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]

Yes__No__ N/A __RMK#__

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?

Yes X No__ N/A ___RMK#__

LAND DISPOSAL RESTRICTION REQUIREMENTS
PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No___ N/A ___ RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes___ No X N/A ___ RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes___ No___ N/A ___ RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a non-wastewater waste to a wastewater to avoid complying with the non-wastewater treatment standard)? — Yes___ No___ N/A ___ RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes___ No___ N/A ___ RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes___ No___ N/A ___ RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___ RMK#_

   a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___ RMK#___

b. ***For determinations based upon analytical testing:*** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

4. Has the generator determined the correct treatability group for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

b. ***For listed wastes which also exhibit a characteristic:*** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

If so, does the notice including the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes_Y_No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes_Y_No___ N/A ___RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes_Y_No___ N/A ___RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes_Y_No___ N/A ___RMK#___

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes_Y_No___ N/A ___RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes_Y_No___ N/A ___RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes_Y_No___ N/A __RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes_Y_No___ N/A __RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes_Y_No___ N/A __RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No___ N/A __RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No___ N/A __RMK#___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No___ N/A __RMK#___

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No___ N/A __RMK#___

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes X No___ N/A ___RMK#___

a. The identification of the contents? — Yes X No___ N/A ___RMK#___

b. The date which accumulation began?

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes_K_No___ N/A ___RMK#___

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes	☒	No	☐	N/A	☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes	☒	No	☐	N/A	☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	☒	No	☐	N/A	☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]	Yes	☒	No	☐	N/A	☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes	☒	No	☐	N/A	☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes	☐	No	☒	N/A	☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes	☐	No	☒	N/A	☐
8.	Does the generator accumulate hazardous waste?	Yes	☒	No	☐	N/A	☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.								
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes	☐	No	☒	N/A	☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).								
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]							
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes	☒	No	☐	N/A	☐
	b. Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes	☐	No	☐	N/A	☒
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	☐	No	☐	N/A	☒
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes	☐	No	☐	N/A	☒
NOTE: Complete appropriate checklist for each unit.								
NOTE: If waste is treated to meet LDRs, use LDR checklist.								
11.	Does the generator export hazardous waste? If so:	Yes	☐	No	☒	N/A	☐
	a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes	☐	No	☐	N/A	☐
	b. Has the generator complied with special manifest requirements? [3745-52-54]	Yes	☐	No	☐	N/A	☐
	c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes	☐	No	☐	N/A	☐
	d. Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes	☐	No	☐	N/A	☐

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☒
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)] Transporter signature only	Yes ☐ No ☒ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)] Never Rejected	Yes ☐ No ☒ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.		If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes ☐ No ☐ N/A ☒
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☒
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes ☒ No ☐ N/A ☐
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]			
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐

26.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☑ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☑ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☑ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☑ No ☐ N/A ☐
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes ☑ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes ☑ No ☐ N/A ☐
29.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☑ No ☐ N/A ☐
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☑ No ☐ N/A ☐
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☑ No ☐ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☑ No ☐ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☑ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]		Yes ☑ No ☐ N/A ☐
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes ☑ No ☐ N/A ☐
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]		Yes ☑ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes ☑ No ☐ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☒ N/A ☐
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☑ No ☐ N/A ☐
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes ☐ No ☒ N/A ☐
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☑ No ☐ N/A ☐
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☑ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☑ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☑ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☑ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☑ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☑ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes ☑ No ☐ N/A ☐
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☑ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☑ No ☐ N/A ☐
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☑
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☑ No ☐ N/A ☐

	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☑ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☑ No ☐ N/A ☐
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☒ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☑ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☑ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☑ No ☐ N/A ☐
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☑ No ☐ N/A ☐
47.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☑ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☑ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☑ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☑ No ☐ N/A ☐
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]		Yes ☑ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☑ No ☐ N/A ☐
NOTE: "Week" means 7 consecutive days per ORC§1.44(A).			
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☑ No ☐ N/A ☐
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☑ No ☐ N/A ☐
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☑ No ☐ N/A ☐
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]		Yes ☑ No ☐ N/A ☐

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☒ No ☐ N/A ☐
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☒ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		Yes ☐ No ☒ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☒ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]		Yes ☒ No ☐ N/A ☐
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☒ No ☐ N/A ☐
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☒ No ☐ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☒ No ☐ N/A ☐
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☒ No ☐ N/A ☐
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☒ No ☐ N/A ☐
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]		Yes ☐ No ☐ N/A ☒
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]		Yes ☐ No ☐ N/A ☒
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]		Yes ☐ No ☐ N/A ☒
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]		Yes ☐ No ☐ N/A ☒
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]		Yes ☐ No ☐ N/A ☒
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]		Yes ☐ No ☐ N/A ☒

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
14.		Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes ☐ No ☐ N/A ☐
15.		If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☐
	e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☐
16.		If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes ☐ No ☐ N/A ☐
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes ☐ No ☐ N/A ☐
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☐
17.		When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes ☐ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes ☐ No ☐ N/A ☐
18.		Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes ☐ No ☐ N/A ☐
19.		Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)(2)]	Yes ☐ No ☐ N/A ☐

UNIVERSAL WASTE LAMPS		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] See notes	Yes ☐ No ☒ N/A ☐
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes ☒ No ☐ N/A ☐
*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] See notes.	Yes ☐ No ☒ N/A ☐
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes ☒ No ☐ N/A ☐
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☒
NOTE: Accumulation is defined as date generated or date received from another handler.		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes ☒ No ☐ N/A ☐
27.	Is the material released characterized? [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes ☒ No ☐ N/A ☐

30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☒ No ☐ N/A ☐
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☒ No ☐ N/A ☐
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes ☐ No ☐ N/A ☒
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:		Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes ☐ No ☐ N/A ☒
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☒
EXPORTS			
35.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☐ N/A ☒
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes ☐ No ☐ N/A ☐
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes ☐ No ☐ N/A ☒

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☒ N/A ☐
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☒ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☐
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.		Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes ☒ No ☐ N/A ☐
12.		If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.		Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes ☐ No ☐ N/A ☒
14.		Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes ☐ No ☐ N/A ☒
15.		Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			